

Exhibit 11

CLEARY GOTTLIEB STEEN & HAMILTON LLP

2112 Pennsylvania Avenue, NW
Washington, DC 20037-3229

T: +1 202 974 1500
F: +1 202 974 1999

clearygottlieb.com

NEW YORK

PARIS

BRUSSELS

LONDON

FRANKFURT

COLOGNE

MOSCOW

D: +1 (202) 974-1554
skaiser@cgsh.com

ROME

MILAN

HONG KONG

BEIJING

BUENOS AIRES

SÃO PAULO

ABUDHABI

SEOUL

GEORGE S. CARY
MITCHELL S. DUPLER
GIOVANNI P. PREZIOSO
MATTHEW D. SLATER
DAVID I. GELFAND
MICHAEL A. MAZZUCHI
MARK W. NELSON
D. BRUCE HOFFMAN
ROBIN M. BERGEN
DEREK M. BUSH
BRIAN BYRNE
PAUL D. MARQUARDT
JEREMY CALSYN
LEAH BRANNON
MATTHEW C. SOLOMON
KATHERINE COONEY CARROLL
ELAINE COX
NOWELL D. BAMBERGER
KENNETH S. REINKER
ALEXIS COLLINS
RESIDENT PARTNERS
KENNETH H. BACHMAN, JR.
DANIEL R. SAYER
RICHARD DEO LINDS
SARA D. SCHOTLAND
WILLIAM B. MCCURN III
JOHN S. MAGNEY
MARK LEDDY
JOHN C. MURPHY, JR.
DAVID M. BECKER
JANET L. WELLER
LINDA J. SOLDO
MICHAEL H. KRIMMINGER
SENIOR COUNSEL
W. RICHARD BIDSTRUP
STEVEN J. KAISER
KATHLEEN WARD BRADISH
CUNZHEN HUANG**
CHASE D. KANIECKI
MACEY LEVINGTON
CARL LAWRENCE MALM
CHARLES STERLING
CARL F. EMIGHOLZ
RESIDENT COUNSEL
JOHN P. MCGILL, JR.
MATTHEW I. BACHRACK
LARRY WORK-DEMBOWSKI
PATRICK FULLER
SAIF I. SHAH MOHAMMED
CHRISTIAN J. MAHONEY
SENIOR ATTORNEYS
EMILY M. ARNOLD
GRAHAM BANNON
HANI BASHOUR
TAYLOR H. BATES
ZACHARY BAUM
ELSIE BETH BENNETT
LINDEN BERNHARDT
JORGE A. BONILLA LOPEZ
MADISON C. BUSH
SAMUEL H. CHANG
CHINWE T. CHUKWUOGO
EVERETT K. CORAOR
LISA M. DANZIG
KATHERINE DENBY
BRANDON J. FIGG
MEREDITH LEIGH FINN
CHRISTOPHER P. FITZPATRICK
ALAN B. FREEDMAN
SAMUEL E. FULLER
LAUREN E. GILBERT*
MELISSA GOHKE
SAVANNAH HAYNES*
CHRISTOPHER J. HILDEBRAND
JESSICA HOLLIS
STEPHEN J. HOUCK
RICHARD HUBER
SAMEER JAYWANT
ANDREW L. KLINE
JOHN L. LIGHTBOURNE
MOLLY MA
NORA MCCLOSKEY
ADAM MOTIWALA
KELSEY NUSSENFELD
RICK REDMOND
BEN ROSENBLUM
MICHAEL G. SANDERS
MICHAEL SCHULMAN
WILLIAM SEGAL
GARRETT D. SHINN
SARAH M. STANTON
NICOLE TATZ
ZACH TSCHIDA
JACK H. WHITELEY*
JIM WINTERING
HUANBING IZZY XU

JEANNE-PALOMA ZELMATTI
IRIS MENGYAO ZHOU
ASSOCIATES
* Admitted only to a bar other than that of the District of Columbia. Working under the supervision of principals of the Washington office.
** Special Legal Consultant, qualified in the People's Republic of China.

March 17, 2022

Joseph R. Saveri, Esq.
Steven N. Williams, Esq.
Ronnie Seidel Spiegel, Esq.
Kevin E. Rayhill, Esq.
Elissa A. Buchanan, Esq.
Anna-Patrice Harris, Esq.
Joseph Saveri Law Firm, LLP
601 California Street, Suite 1000
San Francisco, CA 94108

Re: Jones v. Varsity: Depositions of Bain and Charlesbank

Counsel:

This letter sets forth the respective positions of Bain and Charlesbank as to the depositions of Bain and Charlesbank and their current and former employees. Bain and Charlesbank appreciate the cooperative effort that resulted in the recent filing permitting any depositions of Bain and Charlesbank and their current and former employees to be held through May 7.

As we have indicated to Ms. Malone and Mr. Rayhill on a number of occasions, however, Bain and Charlesbank believe that many of the depositions requested and the sheer number of depositions are unwarranted and, indeed, far disproportional to any needs of the case.

In particular, Plaintiffs have requested depositions of five former and current Bain employees and six former and current Charlesbank employees.

Joseph R. Saveri, Esq., et al.

March 17, 2022

Page 2

As an initial matter, Ms. Steinman and Mr. O'Rourke are no longer employed by Bain and Mr. Kalvelage is no longer employed by Charlesbank. As to the others, Bain will make Mr. Cotton available for deposition on May 5. Charlesbank will make Mr. Beer available on April 19. It is still working on a date for Mr. Janower in the April 19 to May 7 timeframe. Bain and Charlesbank object to the depositions of the others. As sworn evidence that has been submitted to the Court establishes, Mr. Cotton (for Bain) and Mr. Janower and Mr. Beer (for Charlesbank) are more than sufficient to the needs of the case. We are confident that once you have reviewed the materials that are to be produced, you will come to the same conclusion.

Second, as to the 30(b)(6) depositions, Bain and Charlesbank find all of the topics to be, many for multiple reasons. Although Bain and Charlesbank do not object to providing witnesses on appropriate topics under Rule 30(b)(6), they will not do so on the topics as written. We will provide further details on the objections in the near future. Bain and Charlesbank tentatively expect that any 30(b)(6) testimony will be given in conjunction with the depositions of Messrs. Bain, Janower, and Beer as the case may be.

Best regards,



Steven J. Kaiser